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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. 4-13-70148 MAG
)	
Plaintiff,)	STIPULATION REQUESTING
)	PROTECTIVE ORDER, AND ORDER
v.)	
)	
MATTHEW AARON LLANEZA,)	
)	
Defendant.)	
_____)	

The parties respectfully stipulate as follows:

1. The United States wishes to turn over discovery materials in this matter to counsel for defendant Matthew Aaron Llaneza. These materials include information that could compromise government sources and investigative methods if it were released publicly. Accordingly, the United States respectfully asks the Court to enter the protective order set forth below.
2. Defendant's counsel stipulates to entry of the proposed protective order set forth below.
3. Accordingly, the parties respectfully ask the Court to enter the proposed

STIP. REQUESTING PROTECTIVE ORDER, AND ORDER
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protective order set forth below.

DATED: February 16, 2013

_____/s/_____
JEROME MATTHEWS
Attorney for Defendant

DATED: February 21, 2013

_____/s/_____
ANDREW P. CAPUTO
Assistant United States Attorney

PROTECTIVE ORDER

The United States has moved for a protective order limiting the uses to which discovery materials in this case may be put. The Court finds that there is good cause for issuance of such a protective order. Therefore, **IT IS ORDERED THAT:**

1. The contents of the discovery materials in this case shall not be disclosed in any form to any other person by defense counsel except to the client, any investigator(s) for the client, and any other members of defendant's trial team including expert witnesses, and then only for the specific purposes relating to defending the client in this case.

2. Unless expressly authorized by this Court, no information derived from the discovery materials which are the subject of this order may be disclosed to any individual or entity for any other use.

3. This Order applies to all attorneys associated with the above case who have knowledge of this Order regardless of the nature of their involvement in the case. This Order shall be binding on all subsequent attorneys who represent the defendant in this case or any other person who comes into possession of the discovery materials disclosed pursuant to this Order.

4. All persons who come into possession of the discovery materials disclosed pursuant to this Order are required to advise any other persons receiving disclosure of any of the discovery materials of the terms of this Order.

5. A willful violation of this Order shall constitute a criminal contempt of Court for which sanctions are provided by law. The parties who agree to receive information which is

1 subject to this Order agree that this Court has jurisdiction to enter this Order.

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3 Dated: 2/21/2013

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DONNA M. RYU
United States Magistrate Judge